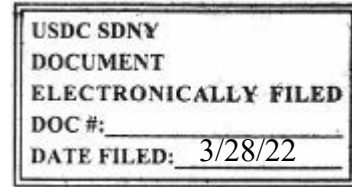

REESE LLP

March 25, 2022

VIA ECF

Judge Alison J. Nathan
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, NY 10007



**RE: *Baron, et al. v. Amazon.com, Inc.*,
No. 1:21-cv-9636-AJN-SN**

Dear Judge Nathan:

Plaintiffs Mary Baron, Calhea Johnson, Malika McLean, and Tony Watson (“Plaintiffs”) and Defendant Amazon.com, Inc. (“Amazon”) (collectively, the “Parties”) have met and conferred about the above-captioned action. The Parties have also met and conferred concerning *Caudel, et al. v. Amazon.com, Inc.*, No. 2:20-cv-848, pending in the U.S. District Court for the Eastern District of California (the “*Caudel* Action”). The *Caudel* Action concerns the same subject matter as the instant matter, and the Parties have retained the same counsel in both actions.

The Parties have met and conferred as to measures to coordinate the two actions in order to conserve judicial resources and for the convenience of the Parties. The Parties agreed that stipulating to and requesting transfer of the instant action and the *Caudel* Action to the U.S. District Court for the Western District of Washington, where Amazon resides, would further those goals.

Specifically, the Parties agreed that transfer would promote convenience for the Parties and witnesses by allowing both matters to be heard in one forum and would conserve judicial and party resources by eliminating motion practice related to the forum-selection clause in Amazon’s Conditions of Use. By entering into this stipulation, neither Party waives any claims, defenses, or arguments as to Amazon’s Conditions of Use, including as to whether or how the Conditions of Use bear on Plaintiffs’ claims.

On February 24, 2022, the Parties jointly requested a thirty (30) day extension of time for Amazon to respond to the Complaint (Dkt. No. 7), during which time the Parties expected to finalize and file the aforementioned stipulation requesting transfer. The next day this Court entered an order granting the stipulated extension of time and ordering that Amazon’s response to the Complaint be filed no later than March 28, 2022 (Dkt. No. 8). The Parties jointly requested and received similar relief in the *Caudel* Action. *Caudel, et al. v. Amazon.com, Inc.*, No. 2:20-cv-848 (Dkt. No. 44) (Feb. 25, 2022).

With this Letter-Motion and consistent with the Parties' stipulation, the Parties jointly request transfer of the instant action to the U.S. District Court for the Western District of Washington.

On March 22, 2022, the parties in the *Caudel* Action jointly requested the same relief in that case. Upon transfer to the Western District of Washington of the instant action by this Court and of the *Caudel* Action by the Eastern District of California, the Parties will meet and confer regarding potential consolidation of the actions, a consolidated amended complaint, and a proposed schedule for responding to any amended complaint.

Accordingly, the parties HEREBY STIPULATE and request that the Court transfer this action to the U.S. District Court for the Western District of Washington.

DATED: March 25, 2022

Respectfully submitted,

By:

/s/ Carlos F. Ramirez
Michael R. Reese
Carlos F. Ramirez
mreese@reesellp.com
cramirez@reesellp.com
Reese LLP
100 West 93rd St, 16th Fl
New York, NY 10025
Phone: 914.860.4994
Facsimile: 212.253.4272

George V. Granade
ggrenade@reesellp.com
Reese LLP
8484 Wilshire Boulevard, Suite 515
Los Angeles, CA 90211
Phone: 310.393.0070
Facsimile: 212.253.4272

Spencer Sheehan
spencer@spencersheehan.com
Sheehan & Associates, P.C.
505 Northern Blvd, Ste 311
Great Neck, NY 11021
Phone: 516.303.0552
Facsimile: 516.234.7800

Attorneys for Plaintiffs
Mary Baron, Calhea Johnson, Malika
McLean, and Tony Watson

CC: All counsel of record (via ECF)

By:

/s/ Charles C. Sipos
Charles C. Sipos
csipos@perkinscoie.com
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Facsimile: 206.359.9000

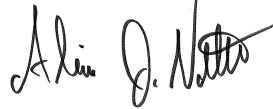
David T. Biderman
dbiderman@perkinscoie.com
Perkins Coie LLP
1888 Century Park E., Suite 1700
Los Angeles, CA 90067-1721
Phone: 310.788.9900
Facsimile: 310.788.3399

Attorneys for Defendant
Amazon.com, Inc.

~~[PROPOSED ORDER]~~

IT IS SO ORDERED.

DATED: 3/28/22

A handwritten signature in black ink, appearing to read "Alison J. Nathan", written over a horizontal line.

Honorable Alison J. Nathan
United States District Judge